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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re

CASH CLOUD, INC.,
dba COIN CLOUD,

Debtor.

Case No. BK-23-10423-mkn

Chapter 11

**NOTICE OF COMBINED HEARING RE:
(I) FINAL APPROVAL OF DISCLOSURE
STATEMENT; AND
(II) CONFIRMATION OF CHAPTER 11
PLAN OF REORGANIZATION
DATED MAY 8, 2023**

Hearing Date: June 28, 2023

Hearing Time: 10:30 a.m.

PLEASE TAKE NOTICE that on May 8, 2023, Cash Cloud, Inc. dba Coin Cloud (“Debtor”), debtor and debtor in possession in the above-captioned case (the “Chapter 11 Case”), filed an *Ex Parte Motion for Order Pursuant to 11 U.S.C. 105(d)(2)(B)(VI), Fed. R. Bankr. P. 3017.1 and Local Rule 3017 Implementing Expedited Solicitation and Confirmation Procedures Including: (I) Conditionally Approving Disclosure Statement; (II) Setting Combined Hearing on Final Approval of Disclosure Statement and Plan Confirmation; (III) Approving (A) Form and Scope of Combined Hearing Notice, and (B) Form of Ballots; (IV) Scheduling Voting and Objection Deadlines; and*

1 (V) *Granting Related Relief* [Docket No. 530] (the “Motion”),¹ seeking, among other things,
 2 conditional approval of the adequacy of Debtor’s *Disclosure Statement in Connection with Debtor’s*
 3 *Chapter 11 Plan of Reorganization Dated May 8, 2023* [Docket No. 529] (the “Disclosure
 4 Statement”).

5 **PLEASE TAKE FURTHER NOTICE** that on May 12, 2023, the United States Bankruptcy
 6 Court for the District of Nevada (the “Bankruptcy Court”) entered an *Order* granting the Motion
 7 [Docket No. 554] (the “Solicitation Order”) which, among other things, conditionally approved the
 8 Disclosure Statement and directed the Debtor to solicit votes with regard to the approval or rejection
 9 of the *Debtor’s Chapter 11 Plan of Reorganization Dated May 8, 2023* [Docket No. 528] (the “Plan”).

10 **PLEASE TAKE FURTHER NOTICE** that a combined hearing to consider the final
 11 approval of the Disclosure Statement, as well as confirmation of the Plan (the “Combined Hearing”)
 12 will commence at **10:30 a.m. prevailing Pacific Time on June 28, 2023**, before the Honorable Mike
 13 K. Nakagawa, United States Bankruptcy Judge, the Foley Federal Building, 300 Las Vegas Boulevard
 14 South, Courtroom No. 2, Las Vegas, Nevada. The Combined Hearing may be continued from time
 15 to time by announcing such continuance in open court or otherwise, without further notice to parties
 16 in interest. The Bankruptcy Court, in its discretion, may impose certain procedural rules governing
 17 the Combined Hearing.

18 **NOTICE IS FURTHER GIVEN** that the hearing will be held remotely. Parties are
 19 permitted to appear telephonically by dialing (669) 254-5252 and entering meeting ID 161 062 2560
 20 and entering access code or passcode 029066#.

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 28 ¹ Capitalized terms not defined herein shall the meanings assigned to them in the Motion.

NOTICE IS FURTHER GIVEN that if you do not want the court to grant the relief sought, or if you want the court to consider your views on the Plan and Disclosure Statement, then you must file an opposition with the Bankruptcy Court, and serve a copy as instructed below.

If you object to the relief requested, you *must* file a **WRITTEN** response to this pleading with the court. You *must* also serve your written response on the person who sent you this notice.

If you do not file a written response with the court, or if you do not serve your written response on the person who sent you this notice, then:

- The court may *refuse to allow you to speak* at the scheduled hearing; and
- The court may *rule against you* without formally calling the matter at the hearing.

PLEASE TAKE FURTHER NOTICE that the deadline to file and serve objections to the final approval of the Disclosure Statement and confirmation of the Plan is **June 12, 2023 at 5:00 p.m. (Pacific Time)** (the “Objection Deadline”). Creditors and parties in interest may object to the conditionally approved Disclosure Statement as permitted by Bankruptcy Rule 3017.1 and Local Rule 3017. Any objection to the Disclosure Statement and/or to the Plan must:

- (i) be in writing;
- (ii) conform to the Bankruptcy Rules and the Local Rules;
- (iii) set forth the name of the objector, the nature and amount of claims or interests held or asserted by the objector against the Debtor’s estate or property, the basis for the objection and the specific grounds therefor, set forth all relevant facts and legal authority, and be supported by affidavits or declarations that conform to Local Rule 9014(c);
- (iv) be served via electronic mail, personal service or overnight delivery upon:
 - (a) counsel to Debtor, Fox Rothschild LLP, 1980 Festival Plaza Drive, Suite 700, Las Vegas, Nevada 89135, Attn: Brett Axelrod;
 - (b) counsel to DIP Lender, (i) Berger Singerman LLP, 1450 Brickell Avenue, Suite 1900, Miami, FL 33131, Attn: Jordi Gusó, and (ii) Sylvester & Polednak Ltd., 1731 Village Center Circle, Las Vegas, NV 89134, Attn: Jeffrey R. Sylvester;
 - (c) counsel to

Genesis Global Holdco, LLC, Cleary Gottlieb Steen & Hamilton LLP, One Liberty Plaza, New York, NY 10006, Attn: Sean A. O’Neal and Jane VanLare; (d) counsel to Enigma Securities Limited, (i) Morrison & Foerster LLP, 250 West 55th Street, New York, NY 10019, Attn: Gary S. Lee and Andrew Kissner, and (ii) Shea Larsen, 1731 Village Center Circle, Suite 150, Las Vegas, NV 89134, Attn: James Patrick Shea; (e) counsel to the Committee of Unsecured Creditors (the “Committee”), (i) Seward & Kissel LLP, One Battery Park Plaza, New York, New York 10004, Attn: John R. Ashmead and Robert J. Gayda, and (ii) McDonald Carano Wilson LLP, 2300 W. Sahara Ave., Suite 1200, Las Vegas, NV 89102 Attn: Ryan J. Works, and (f) the Office of the United States Trustee, 300 Las Vegas Boulevard S., Suite 4300, Las Vegas, NV 89101, Attn: Jared A. Day; and

(v) be filed with the Clerk of the United States Bankruptcy Court for the District of Nevada,

in each case so as to be received no later than 5:00 p.m. (Pacific Time) on the Objection Deadline.

Any party-in-interest who fails to (a) object to the approval of the Disclosure Statement, and/or confirmation of the Plan in writing, (b) timely file such objection in compliance with the Local Rules, and (c) timely serve such objection as set forth above, shall be deemed to have waived any objection to the approval of the Disclosure Statement and/or the confirmation of the Plan.

PLEASE TAKE FURTHER NOTICE that pursuant to the Solicitation Order, the Bankruptcy Court approved the Solicitation Procedures attached as Exhibit “A” to the Solicitation Order. The Solicitation Procedures govern various important aspects of the means by which the Debtor will solicit votes on and seek confirmation of the Plan.

PLEASE TAKE FURTHER NOTICE that copies of the Plan, the Disclosure Statement, the Solicitation Order and other documents are available: (a) electronically through the Court’s CM/ECF system at <http://ecf.nvb.uscourts.gov> (PACER account required); (b) electronically on the following website: <https://cases.stretto.com/CashCloud>; or (c) by contacting Debtor’s counsel, Fox Rothschild,

1 LLP, 1980 Festival Plaza Drive, Suite 700, Las Vegas, Nevada 89135; telephone: (702) 262-6899;
2 Attn: Patricia Chlum, Paralegal, email: pchlum@foxrothschild.com.

3 Dated this 12th day of May, 2023.

4 **FOX ROTHSCHILD LLP**

5 By /s/Brett A. Axelrod
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